



March 23, 2022

VIA E-MAIL

GAVILON FERTILIZER LLC
Attn: MICHAEL HENRY DIRECTOR OF ENVIRONMENTAL
1331 CAPITAL AVE
OMAHA NE 68102

Re: Site Assessment Report. Gavilon Fertilizer, 1200 Kerper Boulevard, Dubuque, Dubuque County, Iowa dated February 21, 2022

Dear Mr. Henry:

The Iowa Department of Natural Resources, Contaminated Sites Section, has reviewed the above referenced site assessment report submitted by Terracon Consultants, Inc. on behalf of Gavilon Fertilizer, LLC. and accepts the report as written with the following explanation. Typically, soil and groundwater contamination levels of ammonia and nitrate found at the Gavilon Fertilizer site would require remedial actions. However, due to the proximity to the Mississippi River levee system and the fertilizer storage tanks, no significantly beneficial remedial efforts can take place. Therefore, no additional assessment or remedial efforts are required at this time.

This is a one-time approval/closure letter due to the site-specific conditions at the Gavilon Fertilizer facility and not to be used for closure criteria at other sites. The Gavilon Fertilizer site can be reopened in the future if conditions change, as one possibility, if the fertilizer tanks are ever decommissioned and removed, additional assessment activities would be required at that time.

Any remaining monitoring wells not needed for other purposes will need to be properly plugged as noted in 567-Iowa Administrative Code (IAC)-39, *Requirements for Properly Plugging Abandoned Wells*. 567-IAC-39.5(4) notes that wells must be properly plugged within 90 days after abandonment. As noted in 567-IAC-39.6(2) please fill out and submit DNR Form 542-1226, Abandoned Water Well Plugging Record, to my attention within 30 days of the date the wells were plugged.

If you have any questions or need further information please feel free to contact me.

Sincerely,

Daniel Cook
Environmental Specialist Senior
Solid Waste & Contaminated Sites Section
dan.cook@dnr.iowa.gov
(515) 537-4025

c: David Scott, Iowa DNR Legal Services Bureau *via email*
Rachel Zander, Iowa DNR Legal Services Bureau *via email*
Mike Sullivan, Supervisor, Iowa DNR Solid Waste & Contaminated Sites Section *via email*
Tom McCarthy, Iowa DNR Field Office #1 *via email*
Dennis R. Sensenbrenner, Terracon Consultants, Inc *via email*